33. (AMENDED) The article of manufacture of claim 23, wherein the method further comprises:

accepting a modified mapping; and

storing the modified mapping in the project file.

34. (AMENDED) A computer readable data structure for representing a software project in a single file, the software project comprising a project application defined by executable programming logic, and a project environment for developing the application, the data structure comprising:

a first section comprising the executable programming logic needed to load and execute the project application in the computer; and

a second section for storing data required to restore the project environment, and for storing information comprising a relationship between elements that have been transferred from a form to an HTML page and HTML files associated with the HTML page in the project.

REMARKS

I. Introduction

In response to the Office Action dated September 22, 2000, claims 1, 2, 6-13, 18, 23, 24, and 28-34 have been amended. Claims 1-34 remain in the application. Re-examination and re-consideration of the application, as amended, is requested.

II. Office Action Specification Objections

In paragraphs 4-5, the Office Action rejects the title of the invention as not descriptive and suggested a new title. Applicants have amended the title as suggested.

The Office Action also objected to various informalities. Applicants have amended the specification to correct typographical errors in the serial number of references sited.

III. Office Action Subject Matter Rejection

In paragraphs 6-7, the Office Action rejected claim 7 under 35 U.S.C. § 112 for insufficient antecedent basis. Applicants have amended claims 7, 18, and 29 as suggested by the Examiner.

In paragraphs 8-9, the Office Action rejected claim 34 under 35 U.S.C. § 101 as being directed to non-statutory subject matter. The Applicants have amended claim 34 as suggested by the Examiner.

Accordingly, Applicants contend that the rejections under §112 and §101 are now moot.

IV. Office Action Prior Art Rejections

In paragraphs 10-11, the Office Action rejected claims 1, 3-4, 6-8, 11-12, 14-15, 17-19, 22-23, 25-26, 28-30, and 33-34 under 35 U.S.C. §103(a) as unpatentable over Foley et al., U.S. Patent No. 5,706,502 (Foley) in view of Arora et al., U.S. Patent No. 5,911,145 (Arora). Applicants respectfully traverse these rejections.

In paragraph 10, the Office Action rejected claims 2, 5, 13, 16, 24, and 27 under 35 U.S.C. §103(a) as being unpatentable over Foley and Arora as applied to claims 1, 12, and 23, and further in view of Mutschler, III et al., U.S. Patent No. 5,940,075 (Mutschler). Applicants respectfully traverse these rejections.

In paragraph 11, the Office Action rejected claims 9-10, 20-21, and 31-32 under 35 U.S.C. §103(a) as being unpatentable over Foley and Arora as applied to claims 1, 12, and 23, and further in view of Lisle et al., U.S. Patent No. 6,069,630 (Lisle). Applicants respectfully traverse these rejections.

Applicants submit that the invention as claimed is patentable for one or more of the following reasons:

(1) None of the cited references teach, disclose, or suggest an element that has been transferred from a form to an HTML page;

(2) None of the cited references teach, disclose, or suggest providing a mapping from an element transferred from a form to an HTML file associated with an HTML page; and

(3) None of the cited references teach, disclose, or suggest displaying a mapping from an element to an HTML file.

Applicants have amended the claims to provide that the element was transferred from a form to an HTML page. Such claim language illustrates that the form may provide a tool for building an HTML page (associated with an HTML file). As described in the specification, since the form contains the element, and many instances of the element may be used in various HTML pages, only one copy of the form (that includes the element) needs to be retrieved locally (see page 15, lines 1-5). Accordingly, processing and transfer time are optimized.

Once the information is read from the project file that contains the relationship between the element and a particular HTML file, the information is processed to obtain a mapping from the element in the form to the HTML file. Once obtained, the mapping is displayed.

Claim 1 was rejected stating Foley teaches:

> -project files within a portfolio file, said portfolio file containing references to members of a set of project files, said project file containing a URL of an HTML file including an applet tag (Foley column 2 lines 55-63, column 8 lines 57-59, Figure 3 item 170A; compare with claim 1 "*reading information from a project file, the information comprising a relationship between the element and the HTML file*").
>
> - processing an applet referenced in each web document (Foley column 5 lines 32-49; compare with claim 1 "*processing the information to map the element to the HTML file*").
>
> - Foley does not specifically teach the display of mapped elements to an HTML file. However, Arora teaches the displayed mapping of elements to an HTML page (Arora column 14 lines 32-36, Figures 22, 42; compare with claim 1 "*displaying the mapping*"). It would have been obvious to one of ordinary skill in the art at the time of the invention to apply Arora to Foley, because of the advantage of visibly showing files, links, and objects of an HTML page in an organized fashion that Arora brings to Foley.

Claim 2 was rejected stating:

> Foley does not specifically teach the use of a form in generating information from said form to an HTML page. However, Mutschler teaches Forms in regard to data binding with HTML (Mutschler Abstract, at bottom, column 3 lines 44-46; compare with claim 2). It would have been obvious to one of ordinary skill in the art at the time of the invention to apply Mutschler to Foley, because of the advantage of form data within a Web environment in an organized that Mutschler brings to Foley.

Claim 5 was rejected stating:

> Foley teaches an element name (Applet2), and an HTML file name (Applet2.htm)(Foley column 10 lines 35-45). Foley does not specifically teach a form name. However, Mutschler teaches data association and data binding utilizing a form name (Mutschler column 9 lines 29-30; compare with claim 5). It would have been obvious to one of ordinary skill in the art at the time of the invention to apply Mutschler to Foley, because of the taught advantage of form data associated with gui controls on a form that Mutschler provides to Foley.

In accordance with the above rejections, it appears that the Examiner contends that forms and form elements are taught in Mutschler. Further, it appears that the Examiner contends that the display of the mapping is taught by Arora. However, as discussed below, Mutschler fails to teach the concept and use of forms as described in the present specification and claimed. Further, as discussed below, Arora fails to teach the concept and use of displaying a mapping of such forms and

form elements as described in the present specification and claimed. Additionally, Foley fails to teach, disclose, or suggest numerous aspects of the present claims.

Foley discloses a portfolio management system. Portfolio files include links to projects that compose a portfolio and project files that set out attributes of one project (see Foley Abstract). As stated in the Office Action, Foley may provide for processing an applet referenced in each web document. However, such processing does not result in mapping the element to the HTML file. Further, the claims as amended provide that the processing results in mapping an element that has been transferred from a form to an HTML page. Foley clearly fails to disclose such a mapping. In Foley, the processing merely provides that the JWS browser pulls in and begins executing any referenced applets found in a Web document (see col. 5, lines 9-31). Accordingly, Foley fails to teach, disclose, or suggest the invention as claimed.

Mutschler discloses a repository coupled to a Web server program for storing description language of a Form to be displayed (See Mutschler Abstract). By reviewing the Background of Mutschler, it is apparent that Mutschler addresses the need to support legacy forms. Column 3, lines 44-46 of Mutschler merely provide that a screen control language (SCL) is dynamically embedded within the HTML of a legacy form. There is no teaching, concept, or suggestion that an element of a form is transferred and associated with an HTML page. Nor is there any teaching, concept, or suggestion that information regarding the relationship is located in a project file (that is read to obtain the relationship information pursuant to the claims). Further, Mutschler does not suggest to process such relationship information to map the element from the form to the HTML file. Accordingly, Mutschler fails to teach, disclose, or suggest the invention as claimed. Nor does Mutschler teach, disclose, or suggest the claim elements that the Office Action purports that Mutschler provides.

The Office Action submits that Arora teaches displaying a mapping of elements to an HTML page. FIGS. 22 and 42 and col. 14, lines 32-36 of Arora provide for an Assets Display that shows the files, links, and objects in a data processing system. The assets shown in FIG. 42 are the draw objects for the products page of FIG. 22. Viewing FIG. 42, it appears that the Assets Display has a name of an object/file, the type of the object, a location of the object, a size of the object, and a date. Thus, FIG. 42 merely provides a listing of the objects within a particular project. There is no mapping indicating an HTML file where the object is located. Furthermore, there is no

indication or concept anywhere in FIG. 42 that the element has been transferred from a form to an HTML page. Listing objects found in a folder is not equivalent to displaying a mapping of elements from a form to an HTML file. Further, there is no suggestion to add a mapping from any other reference to the listing. The listing is merely a listing of very generalized information about objects in a particular project and the folder location where the object is stored. To contend that displaying a list of elements is equivalent to displaying particular specially obtained mapping information is improper. Accordingly, Arora fails to teach, disclose, or suggest the invention as claimed.

"A reference may be said to teach away when a person of ordinary skill, upon reading the reference, would be discouraged from following the path set out in the reference, or would be led in a direction divergent from the path that was taken by the applicant. The degree of teaching away will of course depend on the particular facts; in general, a reference's disclosure will teach away if it suggests that the line of development flowing from the reference's disclosure is unlikely to be productive of the result sought by the Applicant. *In re Gurley*, 27 F.3d 551, 553, 31 U.S.P.Q.2d 1130 (Fed. Cir. 1994).

"If when combined, the references 'would produce a seemingly inoperative device,' then they teach away from their combination." *In re Gurley*, 27 F.3d 551, 553, 31 U.S.P.Q.2d 1130 (Fed. Cir. 1994) (quoting *In re Sponnoble*, 405 F.2d 578, 587, 160 U.S.P.Q. 237, 244 (C.C.P.A. 1969).

When combined, the references actually teach away from the Applicants' invention. For example, the combined references would teach displaying generalized information for objects in a particular Web document in an Assets Display wherein the objects may include various forms. The combined references do not teach any sort of mapping or displaying a mapping that would assist a developer in creating a project (as claimed).

The various elements of the Applicants' claimed invention together provide operational advantages over the systems disclosed in Foley, Arora, Mutschler, and Lisle. In addition, Applicants' invention solves problems not recognized by Foley, Arora, Mutschler, and Lisle.

V. Dependent Claims

Dependent claims 2-11, 13, 22, and 24-33 incorporate the limitations of their related independent claims, and are therefore patentable on this basis. In addition, these claims recite novel

elements even more remote from the cited references. Accordingly, the Applicants respectfully request that these claims be allowed as well.

VI. Conclusion

In view of the above, it is submitted that this application is now in good order for allowance and such allowance is respectively solicited. Should the Examiner believe minor matters still remain that can be resolved in a telephone interview, the Examiner is urged to call Applicants' undersigned attorney.

Respectfully submitted,

Howard J. Glaser et al.

By their attorneys,

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APPENDIX A

CLAIMS

1. (AMENDED) A method of displaying a relationship between an HTML file and an element from a form that is in the HTML file, comprising [the steps of]:

reading information from a project file, the information comprising a relationship between [the] an element that has been transferred from a form to an HTML page and the HTML file associated with the HTML page;

processing the information to map the element from the form to the HTML file; and

displaying the mapping.

2. (AMENDED) The method of claim 1, wherein the information is generated when the element is transferred from [a] the form to [an] the HTML page associated with the HTML file.

3. (UNCHANGED) The method of claim 1, wherein the element is selected from a group comprising:

a visual control; and

a non-visual control, selected from a group comprising a button, a picklist, and a data entry box.

4. (UNCHANGED) The method of claim 1, wherein the information comprises an element name and an HTML file name.

5. (UNCHANGED) The method of claim 4, wherein the information further comprises a form name.

6. (AMENDED) The method of claim 1, wherein the [step of] displaying the mapping comprises [the step of] presenting an element name and an HTML file name in a row of a table.

7. (AMENDED) The method of claim 6, wherein the table comprises cells defined by the row and the column of the cell, and the [modified] mapping is entered into a cell of the table.

8. (AMENDED) The method of claim 1, wherein the [step of] displaying the mapping comprises [the step of] presenting the element name and the HTML file name in a column of a table.

9. (AMENDED) The method of claim 1, further comprising [the step of] flagging an invalid mapping between the element and the HTML file.

10. (AMENDED) The method of claim 9, wherein the [step of] flagging an invalid mapping between the element and the HTML file comprises [the steps of]:

reading the project file;

extracting the HTML filename from the project file;

searching for the HTML file using the extracted HTML filename; and

flagging the mapping as invalid when the extracted HTML file is not found.

11. (AMENDED) The method of claim 1, further comprising [the steps of]:

accepting a modified mapping; and

storing the modified mapping in the project file.

12. (AMENDED) A apparatus for displaying a relationship between an HTML file and an element from a form that is in [to] the HTML file, comprising:

means for reading information from a project file, the information comprising a relationship between [the] an element that has been transferred from a form to an HTML page and the HTML file associated with the HTML page;

means for processing the information to map the element from the form to the HTML file; and

a display for presenting the mapping to a user.

13. (AMENDED) The apparatus of claim 12, wherein the information is generated when the element is transferred from [a] the form to [an] the HTML page associated with the HTML file.

14. (UNCHANGED) The apparatus of claim 12, wherein the element is selected from a group comprising:

a visual control;

a non-visual control, selected from a group comprising a button, a picklist, and a data entry box.

15. (UNCHANGED) The apparatus of claim 12, wherein the information comprises an element name and an HTML file name.

16. (UNCHANGED) The apparatus of claim 15, wherein the information further comprises a form name.

17. (UNCHANGED) The apparatus of claim 12, wherein the means for displaying the mapping comprises means for presenting the element name and the HTML file name in a row of a table.

18. (AMENDED) The apparatus of claim 17, wherein the table comprises cells defined by the row and the column of the cell, and the [modified] mapping is entered into a cell of the table.

19. (UNCHANGED) The apparatus of claim 12, wherein the means for displaying the mapping comprises means for presenting the element name and the HTML file name in a column of a table.

20. (UNCHANGED) The apparatus of claim 12, further comprising means for flagging an invalid mapping between the element and the HTML file.

21. (UNCHANGED) The apparatus of claim 20, wherein the means for flagging an invalid mapping between the element and the HTML file comprises:

means for reading the project file;

means for extracting the HTML filename from the project file;

means for searching for the HTML file using the extracted HTML filename; and

means for flagging the mapping as invalid when the extracted HTML file is not found.

22. (UNCHANGED) The apparatus of claim 12, further comprising:

means for accepting a modified mapping; and

means for storing the modified mapping in the project file.

23. (AMENDED) An article of manufacture, embodying logic to perform a method [steps] of displaying a relationship between an HTML file and an element that has been transferred from a form to an HTML page [to the HTML file], the method [steps] comprising [the steps of]:

reading information from a project file, the information comprising a relationship between [the] an element that has been transferred from a form to an HTML page and the HTML file associated with the HTML page;

processing the information to map the element from the form to the HTML file; and

displaying the mapping.

24. (AMENDED) The article of manufacture of claim 23, wherein the information is generated when the element is transferred from [a] the form to [an] the HTML page associated with the HTML file.

25. (UNCHANGED) The article of manufacture of claim 23, wherein the element is selected from a group comprising:

a visual control; and

a non-visual control, selected from a group comprising a button, a picklist, and a data entry box.

26. (UNCHANGED) The article of manufacture of claim 23, wherein the information comprises an element name and an HTML file name.

27. (UNCHANGED) The article of manufacture of claim 26, wherein the information further comprises a form name.

28. (AMENDED) The article of manufacture of claim 23, wherein the [method step of] displaying the mapping comprises [the method step of] presenting the element name and the HTML file name in a row of a table.

29. (AMENDED) The article of manufacture of claim 28, wherein the table comprises cells defined by the row and the column of the cell, and the [modified] mapping is entered into a cell of the table.

30. (AMENDED) The article of manufacture of claim 23, wherein the [method step of] displaying the mapping comprises [the method step of] presenting the element name and the HTML file name in a column of a table.

31. (AMENDED) The article of manufacture of claim 23, wherein the method [steps] further [comprise] comprises [the method step of] flagging an invalid mapping between the element and the HTML file.

32. (AMENDED) The article of manufacture of claim 31, wherein the [method step of] flagging an invalid mapping between the element and the HTML file comprises [the method steps of]:

reading the project file;

extracting the HTML filename from the project file;

searching for the HTML file using the extracted HTML filename; and

flagging the mapping as invalid when the extracted HTML file is not found.

33. (AMENDED) The article of manufacture of claim 23, wherein the method [steps] further [comprise] comprises [the steps of]:

accepting a modified mapping; and

storing the modified mapping in the project file.

34. (AMENDED) A computer readable data structure [readable by computer] for representing a software project in a single file, the software project comprising a project application defined by executable programming logic, and a project environment for developing the application, the data structure comprising:

a first section comprising the executable programming logic needed to load and execute the project application in the computer; and

a second section for storing data required to restore the project environment, and for storing information comprising a relationship between elements that have been transferred from a form to an HTML page and HTML files associated with the HTML page in the project.